

STANDARD INSPECTION REPORT OF A GAS DISTRIBUTION OPERATOR RECORD AUDIT

Unless otherwise noted, all code references are to 49CFR Part 192.
If an item is marked Unsatisfactory, Not Applicable, or Not Checked, an explanation must be included in this report.

Operator: AMEREN ILLINOIS COMPANY	Operator ID#: 32513
Inspection Date(s): 1/19/2016, 1/20/2016, 1/21/2016, 1/26/2016, 1/27/2016, 1/28/2016	Man Days: 6
Inspection Unit: Belleville/E. St. Louis	
Location of Audit: Belleville	
Exit Meeting Contact: Joe Orsa	
Inspection Type: Standard Inspection - Record Audit	
Pipeline Safety Representative(s): Jim Watts	
Company Representative to Receive Report: Michael Fuller	
Company Representative's Email Address: mfuller2@ameren.com	

Headquarters Address Information:	300 Liberty Peoria, IL 61602 Emergency Phone#: (800) 755-5000 Fax#:	
Official or Mayor's Name:	Ron Pate Phone#: (217) 424-6518 Email:	
Inspection Contact(s)	Title	Phone No.
Bob Roth	Superintendent of Quality Assurance	
Joe Orsa	Quality Assurance Consultant	

Gas System Operations	Status
Gas Transporter	Enable (MRT) and a Landfill.
Annual Report (Form 7100.1-1) reviewed for the year:	Not Checked
<u>General Comment:</u> <i>The annual report was not reviewed during this audit as it is reviewed during the audit performed at the Ameren Training Center in Pawnee.</i>	
Unaccounted for Gas	Not Checked
<u>General Comment:</u> <i>The annual report was not reviewed during this audit as it is reviewed during the audit performed at the Ameren Training Center in Pawnee.</i>	
Number of Services	Not Checked

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<u>General Comment:</u>		
<i>The annual report was not reviewed during this audit as it is reviewed during the audit performed at the Ameren Training Center in Pawnee.</i>		
Miles of Main	Not Checked	
<u>General Comment:</u>		
<i>The annual report was not reviewed during this audit as it is reviewed during the audit performed at the Ameren Training Center in Pawnee.</i>		
Is the operator maintaining documentation verifying their Maximum Allowable Operating Pressure(s)? (MAOP)	Satisfactory	
Operating Pressure (Feeder)	75-380	
Operating Pressure (Town)	.361,15,20,25,32,35,37,40,50,55	
Operating Pressure (Other)	Not Applicable	
<u>General Comment:</u>		
<i>There are no other operating pressures.</i>		
MAOP (Feeder)	100 - 720	
MAOP (Town)	.433,.505,24,25,30,35, 45,50,60	
MAOP (Other)	Not Applicable	
<u>General Comment:</u>		
<i>There are no other MAOP's.</i>		
Does the operator have any transmission pipelines?	Yes	
<u>General Comment:</u>		
<i>The maintenance and operations on the segments of transmission located in the Belleville Service Area are conducted by the Belleville Operations Group. Design is handled by the Transmission Engineering group located in Decatur, Illinois.</i>		
Regulatory Reporting Records		Status
[191.5]	Were Telephonic Notices of Incidents reported to the NRC (800-424-8802)?	Not Applicable
<u>General Comment:</u>		
<i>No reportable incidents occurred in the Belleville Service Area in 2014.</i>		
[191.9(a)]	Was a DOT Incident Report Form F7100.1 submitted within 30 days after detection of an incident?	Not Applicable
<u>General Comment:</u>		
<i>No reports were required due to no reportable incidents occurring in the Belleville Service Area in 2014.</i>		
[191.9(b)]	Were any supplemental incident reports submitted when deemed necessary?	Not Applicable

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<u>General Comment:</u>		
<i>No supplemental reports were required due to no reportable incidents occurring in the Belleville Service Area in 2014.</i>		
Did the operator have any plastic pipe failures in the past calendar year?	No	
<u>General Comment:</u>		
<i>There were no plastic pipe failures in the Belleville Service Area that required reporting in 2014.</i>		
Did the operator take action to mitigate safety concerns relating to the failure of the PE or pipeline components?	Not Applicable	
<u>General Comment:</u>		
<i>There were no plastic pipe failures in the Belleville Service Area that required reporting in 2014.</i>		
[191.23(a)]	Did the operator report Safety Related Conditions?	Not Applicable
<u>General Comment:</u>		
<i>No Safety Related conditions occurred in the Belleville Service Area in 2014.</i>		
[191.25]	Did the Operator file a Safety Related Condition Report within 5 working days of determination, but not later than 10 working days after discovery?	Not Applicable
<u>General Comment:</u>		
<i>No reporting was required due to no Safety Related Conditions occurring in the Belleville Service Area in 2014.</i>		
[192.16(c)]	Customer Notification: Has the operator notified each new customer within 90 days about the customer's responsibility regarding buried piping, however, operators of a master meter may continuously post a general notice in a permanent location?	Satisfactory
<u>General Comment:</u>		
<i>Ameren sends a new customer packet to the individual after requesting gas service. This is sent out to the customer within 7 days of receiving the request.</i>		
TEST REQUIREMENTS		Status
[192.517(a)][192.505,192.507,192.511(c)]	Are pressure test records being maintained for piping operating above 100 psig?	Satisfactory
<u>General Comment:</u>		
<i>Review of pressure testing on installations performed in 2014 indicates piping installed or disconnected and reconnected was pressure tested as required.</i>		
[192.517(b)][192.511,192.509,192.513]	Are pressure test records being maintained for at least 5 years on piping operating below 100 psig?	Satisfactory
<u>General Comment:</u>		

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<i>Pressure testing documentation is retained for the life of the system.</i>		
[192.603(b)][192.725]	Were service lines temporarily disconnected from the main properly tested prior to reconnection?	Satisfactory
<u>General Comment:</u> <i>Review of leak repair documentation for 2014 indicates that services that were temporarily disconnected were pressure tested as required.</i>		
UPRATING		Status
<u>Category Comment:</u> <i>No uprating was performed in the Belleville Service Area in 2014.</i>		
[192.555][192.555]	Has the operator maintained documentation of uprating activities when uprating a pipe to a pressure that will produce a hoop stress of 30% or more SMYS?	Not Applicable
[192.557][192.557]	Has the operator maintained documentation of uprating activities when uprating a pipe to a pressure that will produce a hoop stress of less than 30% SMYS?	Not Applicable
OPERATIONS		Status
[192.603(b)][192.605(a)]	Has the operator conducted a review of the Operations and Maintenance Manual once per yr/15 months?	Not Checked
<u>General Comment:</u> <i>Determination as to when the Annual Review of the O&M was performed is reviewed during the Ameren Illinois Training Center audit to be performed at a later date for 2014. This was not confirmed during this audit.</i>		
Has the operator conducted a review of the Operator Qualification Plan once per yr/15 months?		Not Checked
<u>General Comment:</u> <i>Auditing of the 2014 OQ plan is completed during a separate audit performed at the Ameren Illinois Training Center in Pawnee, Illinois audit and was not reviewed as part of this audit.</i>		
[192.603(b)][192.605(b)(3)]	Are construction records, maps, and operating history available to operating personnel?	Satisfactory
<u>General Comment:</u> <i>Review of construction records, maps and operating history are available to field personnel using mobile computer mapping, contact through engineering or having access to other documentation through the local office personnel or their supervisor.</i>		
[192.603(b)][192.605(b)(8)]	Has the operator periodically reviewed personnel's work to determine the effectiveness of normal O&M procedures when deficiencies are found?	Satisfactory
<u>General Comment:</u>		

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This is met by random audits that are performed by Ameren Quality Assurance Personnel field reviews and Supervisory field reviews. This documentation is retained at the Ameren Training Center and reviewed during that separate audit.

CONTINUING SURVEILLANCE RECORDS		Status
[192.603(b)][192.613(a)]	Has the operator reviewed continuing surveillance records for class location changes, failures, leak history, corrosion, changes in cathodic protection, and other unusual operating and maintenance conditions?	Satisfactory
<u>General Comment:</u> <i>Ameren has reviewed continuing surveillance records for class location changes, failures, leak history, corrosion, changes in cathodic protection and other unusual operating and maintenance conditions. Review of leaks indicate they are being trended and repaired as required. Review of corrosion records indicate issues identified through monitoring and leak repairs had corrective actions taken to repair the issue. Review of patrols indicate they are including class location changes as part of the patrol. Failures on plastic piping are being submitted for review by Ameren Compliance Personnel and reported to the PHMSA database as required.</i>		
[192.491][192.489]	Does the operator have records verifying if exposed cast iron was examined for evidence of graphitization and if necessary what appropriate action was taken concerning graphitization?	Not Applicable
<u>General Comment:</u> <i>There is no cast iron piping in the Belleville Service Area.</i>		
[192.603(b)][192.755]	Does the operator have surveillance records of cast iron pipelines, including appropriate action resulting from tracking circumferential cracking failures, study of leak history, or any other unusual operating and maintenance conditions?	Not Applicable
<u>General Comment:</u> <i>There is no cast iron piping in the Belleville Service Area.</i>		
[192.603(b)][192.753(a)]	Is each cast iron caulked bell and spigot joint that is subject to a pressure of more than 25 (psig.) sealed as required?	Not Applicable
<u>General Comment:</u> <i>There is no cast iron piping in the Belleville Service Area.</i>		
[192.603(b)][192.753(b)]	Is each cast iron caulked bell and spigot joint that is subject to a pressure of 25 (psig.) or less and is exposed for any reason sealed as required?	Not Applicable
<u>General Comment:</u> <i>There is no cast iron piping in the Belleville Service Area.</i>		

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DAMAGE PREVENTION RECORDS		Status
<u>Category Comment:</u>		
<i>Damage Prevention records are reviewed during a separate audit performed at the Pawnee Training Center. There were not reviewed as part of this audit.</i>		
[192.603(b)][191.11(a)]	Did the operator track the number of damages per 1000 locate requests for the previous years?	Not Checked
Has the number of damages increased or decreased from prior year?		Not Checked
[192.603(b)][192.617]	Does the operator track records of accidents due to excavation damage to ensure causes of failures are addressed to minimize the recurrence?	Not Checked
[192.603(b)][192.614(c)(3)]	Does the operator provide documentation pertaining to notification of excavation, marking, positive response, and the availability and use of the one call system?	Not Checked
Does the operator have a Quality Assurance Program in place for monitoring the locating and marking of facilities?		Not Checked
Do pipeline operators include performance measures in facility locating contracts?		Not Checked
[IL ADM. CO.265.100(b)(1)]	Was third party damage to mains involving a release of gas reported to ICC JULIE Enforcement? http://www.icc.illinois.gov/julie/	Not Checked
Has the Operator adopted applicable sections of the Common Ground Alliance Best Practices?		Not Checked
Were Common Ground Alliance Best Practices discussed with the Operator?		Not Checked
EMERGENCY PLANS		Status
[192.603(b)][192.615(b)(1)]	Are supervisors, responsible for emergency action, furnished copies of the latest edition of the Emergency Plan?	Satisfactory
<u>General Comment:</u>		
<i>Staff confirmed Supervisors are supplied with current copies of the Emergency Plan annually. Their plans can also be accessed electronically through their online system.</i>		
[192.603(b)][192.615(b)(2)]	Has the operator maintained documentation that the appropriate operating personnel have received training to assure they are knowledgeable of emergency procedures and that the training was effective?	Satisfactory
<u>General Comment:</u>		
<i>The emergency plan review was conducted in the Belleville Service Area in March of 2014 and was conducted with the 15 month, calendar year limitation.</i>		
[192.603(b)][192.615(b)(3)]	Has the operator maintained documentation	Not Applicable

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	of employee activity reviews to determine whether the procedures were effectively followed in each emergency?	
General Comment: <i>No reviews were required to be conducted in the Belleville Service Area in 2014 due to issues with procedures being followed during an emergency.</i>		
[192.603(b)][192.615(c)]	Has the operator maintained documentation that the operator established and maintained liaison with appropriate fire, police and other public officials?	Not Checked
General Comment: <i>This is reviewed during the Public Awareness plan and record review performed at the Ameren Training Center. This was not reviewed as part of this audit.</i>		
[192.603(b)][192.615(a)(3)]	Did the review of emergency response time intervals regarding odor/leak complaint documentation indicate adequate emergency response intervals were achieved?	Satisfactory
General Comment: <i>There were 6 leak calls in 2014 for the Belleville Service Area that exceeded the 60 minute criteria. Four were multiple leak calls, one was weather related and the last was confusion between dispatch and the first responder as to the addresses of the leak. The confusion was due to two leaks with similar addresses being received and dispatched.</i>		
ODORIZATION OF GAS		Status
[192.603(b)][192.625(f)]	Has the operator maintained documentation of odorant concentration level testing using an instrument?	Satisfactory
General Comment: <i>Review of the monthly odorometer testing performed in the Belleville Service Area during 2014 indicate the gas was readily detectable at concentrations well below 1/5 the lower explosive limit.</i>		
[192.603(b)][192.625(e)]	Has the operator maintained documentation of odorizer tank levels?	Satisfactory
General Comment: <i>Review of the monthly tank levels and odorizer operation inspections indicate the inspections were performed as required in 2014.</i>		
[192.603(b)][192.625(f)(1)]	Are master meter operators receiving written verification of odorant concentration levels from their gas supplier?	Not Applicable
General Comment: <i>Ameren is not a Master Meter operator. This requirement does not apply.</i>		
[192.603(b)][192.625(f)(2)]	Has the master meter operator maintained documentation of sniff tests performed as required by this section?	Not Applicable

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<u>General Comment:</u> Ameren is not a Master Meter operator. This requirement does not apply.		
PATROLLING & LEAKAGE SURVEY		Status
[192.603(b)][192.721(b)(1)]	Is the operator patrolling business districts at a minimum of 4 per year/4 1/2 months?	Not Applicable
<u>General Comment:</u> There are no critical areas where main is located above ground or where physical movement is anticipated that require a patrol within a business district in the Belleville Service Area.		
[192.603(b)][192.721(b)(2)]	Is the operator patrolling outside business districts at a minimum of 2 per year/7 1/2 months?	Satisfactory
<u>General Comment:</u> Review of patrols conducted in 2014 for the Belleville Service Area indicate they were completed as required. The necessary corrective actions were also documented as having been taken for missing signs or other issues identified during the patrol.		
[192.603(b)][192.723(b)(1)]	Is the operator performing leakage surveys in business districts at a minimum of 1 per year/ 15 months? If the operator has inside meter sets that meet this criterion then were those surveyed?	Satisfactory
<u>General Comment:</u> Review of business district leak survey documentation for the Belleville Service Area for 2014 indicate they were conducted as required.		
[192.603(b)][192.723(b)(2)]	Is the operator performing leakage surveys outside a business district at a minimum of every 5 years/63 months? Is the operator performing leakage surveys on cathodically unprotected pipelines at a minimum of every 3 years/39 months? If the operator has inside meter sets that meet this criterion then were those surveyed? If the operator has yard lines then are those being surveyed?	Satisfactory
<u>General Comment:</u> Review of residential leakage surveys conducted in 2014 for the Belleville Service Area indicate they were conducted as required on a 4 year cycle as required due to the Ameren waiver. There were also special surveys conducted in the Belleville Service Area that were initiated due to areas of subsidence. At this time these are annual surveys. Ameren has another special leakage survey for casing installations that have casing of which they cannot monitor the casing piping for cathodic levels. Due to this they are considered as a shorted casing and leak surveyed annually. Currently there are 22 locations in the distribution system where these are being leak surveyed annually in the Belleville Service Area. There are also segments of transmission lines that were leak surveyed annually in the Belleville Service Area and the records of these surveys are retained by the local service area. Staff reviewed these surveys and established they were conducted as required in 2014.		
YARD LINES - RESIDENTIAL		Status

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[220 ILCS 2.2.03]	Has the operator designated and documented the location of all services where the meter is located more than 3 feet away from the wall of a residence?	Satisfactory
<u>General Comment:</u> Review of Yard Line leak surveys performed in 2014 for the Belleville Service Area indicate they were completed as required.		
[192.463,220 ILCS 2.2.03][220 ILCS 2.2.03]	Has the operator determined if cathodic protection is required on these services?	Not Applicable
<u>General Comment:</u> Ameren leak surveys all yard lines as if they are unprotected and completes the surveys on a three year interval.		
[192.723(b)(1),192.723(b)(2)][220 ILCS 2.2.03]	After the determination of the cathodic protection requirements, has the operator surveyed each line within the required leakage survey intervals?	Satisfactory
<u>General Comment:</u> Review of Yard Line survey documentation for the Belleville Service Area in 2014 indicates they were leak surveyed as required on a three year interval.		
ABANDONMENT or DEACTIVATION of FACILITIES PROCEDURES		Status
[192.603(b)][192.727(b)]	Did the operator maintain documentation demonstrating that each pipeline abandoned in place was disconnected from all sources and supplies of gas, and purged of gas?	Satisfactory
<u>General Comment:</u> Review of replacement orders and abandonments for 2014 in the Belleville Service Area indicated when piping was replaced and or abandoned, it was disconnected from it source of supply and it was cut off and capped or it was removed as part of the work.		
[192.603(b)][192.727(c)]	Did the operator maintain documentation demonstrating that each inactive pipeline that is not being maintained under this part was disconnected from all sources and supplies of gas; purged of gas?	Satisfactory
<u>General Comment:</u> Review of replacement orders and abandonments for 2014 in the Belleville Service Area indicated when piping was replaced and or abandoned, it was disconnected from it source of supply and it was cut off and capped or it was removed as part of the work.		
[192.603(b)][192.727(d)]	Did the operator maintain documentation demonstrating that whenever service to a customer was discontinued access to gas was either; locked, prevented by a mechanical fitting, or disconnected from the gas supply and open pipe ends sealed?	Satisfactory
<u>General Comment:</u>		

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Review of hazardous condition documentation identified during leak calls or other service work for 2014 in the Belleville Service Area, indicate when issues were detected downstream of the meter, the riser valve was locked in the closed position to discontinue service and in some cases the meter was also removed and the outlets of the meter bar were capped or plugged.

[192.603(b)][192.727(e)]	Did the operator maintain documentation when air was used for purging that a combustible mixture was not present after purging?	Satisfactory
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General Comment:

Review of abandonment records indicate purging was performed as required in 2014.

[192.727(g)][192.727(g)]	Did the operator maintain documentation for each abandoned onshore pipeline facility that crosses over, under or through a commercially navigable waterway?	Not Applicable
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General Comment:

No piping was abandoned that crossed a navigable waterway in the Belleville Service Area in 2014.

PRESSURE LIMITING AND REGULATION	Status
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[192.603(b)][192.739(a)]	Is the operator inspecting and testing the pressure limiting and regulating stations at a minimum of 1 per year/15 months?	Satisfactory
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General Comment:

Review of pressure regulating and limiting station inspections retained in the Gas Compliance System for the Belleville Service Area for 2014 indicate they were inspected as required in 2014.

[192.603(b)][192.743(a)]	Is the operator inspecting pressure limiting and regulating stations for adequate capacity at a minimum of 1 per year/15 months?	Satisfactory
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General Comment:

Review of the annual inspection on the overpressure protection devices maintained in the Gas Compliance System for the Belleville Service Area indicate the capacity calculations were reviewed annually not to exceed 15 months in 2014.

[192.603(b)][192.743(b)]	If the operator used calculations to determine sufficient capacity, were the calculation reviews documented at a minimum of 1 per year/15 months?	Satisfactory
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General Comment:

Review of the annual inspection on the overpressure protection devices maintained in the Gas Compliance System for the Belleville Service Area indicate the capacity calculations were reviewed annually not to exceed 15 months in 2014.

[192.603(b)][192.741(a),192.741(b)]	Is each distribution system supplied by more than one district pressure regulating station, or where required by the operator on a system supplied by a single regulating station, equipped with telemetering or recording pressure gauges to indicate the	Not Checked
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	gas pressure in the district?	
General Comment: <i>The systems that are supplied by two sources of supply have electronic chart recorders present. These are monitored by Ameren Gas Control and the review of corrective actions to alarms due to pressure or other issues is maintained by Gas Control and are reviewed during a separate audit.</i>		
[192.603(b)][192.741(c)]	If there were indications of abnormally high- or low-pressure, were actions taken to correct any unsatisfactory operating conditions?	Not Checked
General Comment: <i>There were no indications of abnormally high or low pressures identified during the review of the pressure regulating and limiting station inspections reviewed for 2014. Review of the electronic chart recorders located in the Ameren System is performed at Gas Control previously located in Springfield and is moving to Decatur, Illinois. Gas Control monitors all electronic pressure recorders for Ameren. These records will be reviewed during a separate audit performed at Gas Control.</i>		
[192.603(b)][192.743(a), 192.743(b), 192.195(b)(2)]	Is overpressure protection provided by the supplier pipeline downstream of the take point?	Yes
General Comment: <i>Ameren has 4 locations that rely on the supplier (Enable) to provide overpressure protection. The supplier provides Ameren with the inspection documentation to indicate they are inspected and have adequate capacity. These are Enable take point stations at Valley Junction, St Rose, Route 13 and Washington Park. Over pressure protection is supplied at three locations using monitor regulators and one take point has a relief valve. Ameren was provided the inspection documentation for 2014 from Enable and was reviewed by Staff with no issues being identified.</i>		
[192.603(b)][192.743(a)]	If Yes, does the operator have documentation to verify that these devices have adequate capacity?	Satisfactory
General Comment: <i>Ameren has 4 locations that rely on the supplier (Enable) to provide overpressure protection. The supplier provides Ameren with the inspection documentation to indicate they are inspected and have adequate capacity. These are Enable Stations at Valley Junction, St Rose, Route 13 and Washington Park. Three are monitor regulators and one has a relief valve. Ameren was provided the inspection documentation for 2014 from Enable and was reviewed by Staff.</i>		
VALVE MAINTENANCE		Status
[192.603(b)][192.747(a), 192.747(b)]	Did the operator inspect and maintain distribution valves necessary for the safe operation of the system at a minimum of 1 per year/15 months?	Satisfactory
General Comment: <i>Review of the distribution valve inspections performed in 2014 for the Belleville Service Area indicate they were inspected as required and were completed within the 15 month, calendar year requirement. This included valves inspected by Operations and Technical Services (Regulator Station Valves).</i>		
[192.603(b)][192.749(a)]	Did the operator inspect and maintain vaults > 200 cubic feet at a minimum of 1 per year/15 months?	Not Applicable
General Comment: <i>There are no vaults in the Belleville Service Area meeting these requirements.</i>		
Investigation Of Failures		Status

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[192.603(b)][192.617]	Did the operator experience accidents or failures requiring analysis?	Satisfactory
<u>General Comment:</u> <i>There were no accidents that required analysis. There was one failed fitting on a 3 inch Kerotest insulating fitting that was sent to GTI for evaluation. Their evaluation determined there was an impact zone on the fiberglass portion of the fitting and resulted in a path for gas to migrate and leak.</i>		
WELDING OF STEEL PIPE		Status
[192.603(b)][192.225(b)]	Does the operator have documentation for their qualified welding procedure?	Satisfactory
<u>General Comment:</u> <i>Ameren's welding procedures were requalified in 2013-2014. There are retained as part of the O&M.</i>		
[192.603(b)][192.227, 192.229]	Does the operator have documentation of welder qualification as required?	Satisfactory
<u>General Comment:</u> <i>There are 10 gas employees currently qualified to weld on the gas system in 2014. Review of those individuals documentation indicates each had an annual and six month re-qualification in 2014.</i>		
[192.807]	Does the operator have documentation of welder OQ records?	Satisfactory
<u>General Comment:</u> <i>The qualification records reviewed for the 10 welders currently in the Belleville Service Area are maintained on an Ameren share point site. Their OQ records are reviewed during the separate OQ audit.</i>		
[192.709][192.243(b)(2)]	Does the operator have documentation of NDT personnel qualification as required?	Not Applicable
<u>General Comment:</u> <i>There was no welding performed in 2014 within the Belleville Service Area that required non-destructive testing.</i>		
[192.709][192.243(f)]	Does the operator have documentation of NDT testing performed?	Not Applicable
<u>General Comment:</u> <i>There was no welding performed in 2014 within the Belleville Service Area that required non-destructive testing.</i>		
JOINING OF MATERIAL OTHER THAN WELDING		Status
<u>Category Comment:</u> <i>Plastic piping qualification records are reviewed during the Ameren Training Center audit. These records were not reviewed as part of this audit.</i>		
[192.603(b)][192.285]	Are persons making joints with plastic pipe qualified?	Not Checked
[192.603(b)][192.287]	Are persons inspecting plastic pipe joints qualified?	Not Checked

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[192.603(b)][192.283]	Are qualified joining procedures for plastic pipe in place?	Not Checked
CORROSION CONTROL RECORDS		Status
[192.491(a)][192.491(a)]	Has the operator maintained maps or records of cathodically protected piping, cathodic protection facilities, galvanic anodes, and neighboring structures bonded to the cathodic protection system?	Satisfactory
General Comment: Ameren maintains documentation of cathodically protected facilities utilizing maps and DOJM work orders and is now including the locations of anodes and other corrosion protection facilities. Ameren is now utilizing MAXIMO to track and identify all new and existing corrosion facilities and will be the official record for their installation and location.		
[192.491][192.459]	Has the operator maintained documentation of an examination when buried pipe was exposed?	Satisfactory
General Comment: Review of buried pipe exam reports completed in 2014 indicate pipe inspections were completed as required. Review of corrective actions taken regarding low potentials detected during the pipe exams indicate corrective actions were taken.		
[192.491][192.465(a)]	Has the operator maintained documentation of annual pipe-to-soil monitoring performed at a minimum of 1 per yr/15 months and/or isolated services or short sections of main less than 100 feet at a minimum of 10% annually?	Satisfactory
General Comment: Review of annual corrosion monitoring surveys performed in 2014 indicate they were completed as required. Review of isolated main and service inspections indicate they were performed as required in 2014 with a minimum of 10 percent being completed in each town or system.		
[192.491][192.465(b)]	Has the operator maintained documentation of rectifier or other impressed current power sources inspections at a minimum of 6 per year/ 2 1/2 months?	Satisfactory
General Comment: Review of rectifier inspections performed in 2014 indicate the rectifiers located in the Belleville Service Area were inspected as required.		
[192.491][192.465(c)]	Has the operator maintained documentation of each critical interference bond, reverse current switch, diode, etc. inspections at a minimum of 6 per year/ 2 1/2 months and/or non-critical interference bond inspections at a minimum of 1 per year/15 months?	Satisfactory
General Comment: Review of critical bonds located in the Belleville Service Area indicate they were inspected and tested as required in 2014.		

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[192.491][192.465(d)]	Has the operator taken prompt remedial actions to correct any deficiencies indicated by the monitoring?	Satisfactory
<u>General Comment:</u> Review of documentation regarding deficiencies identified in 2014 during the Belleville Service Area corrosion monitoring and testing, indicates corrective actions were implemented as required. The corrective action documentation also indicates follow up readings were conducted to establish protective levels where required. The corrective actions for 2014 were retained in a database called PETE but has since been migrated into MAXIMO. Staff and Ameren personnel determined during this audit that this information is in MAXIMO but is not currently readily accessible to the users. Due to these findings, Charles Rayot is working to correct the accessibility of this information.		
[192.491][192.465(e)]	Has the operator maintained documentation of unprotected pipeline surveys, inspections, or tests at a minimum of 3 years/39 months?	Satisfactory
<u>General Comment:</u> The only known unprotected piping in the Belleville Service Area are the yard lines which are surveyed on a three year interval.		
[192.491][192.467(a),192.467(c),192.467(d)]	Has the operator maintained documentation of inspections or tests for electrical isolation at casings?	Satisfactory
<u>General Comment:</u> Review of casing inspections performed in the Belleville Service Area for 2014 indicate they were inspected as required for electrical isolation with the exception of the 22 locations that are currently unable to get a reading on the casing. In these instances the casing installation only on distribution facilities were leak surveyed annually during a special survey.		
[192.491][192.469]	Does the operator have a sufficient number of test stations or other contact points for electrical measurement to determine the adequacy of cathodic protection?	Satisfactory
<u>General Comment:</u> Review of test points located in the Belleville Service Area for 2014 indicate they have a sufficient number of test points for each segment of protected piping.		
[192.491][192.471]	Has the operator maintained documentation of corrective actions taken when a test lead is no longer electrically conductive?	Satisfactory
<u>General Comment:</u> Review of corrective actions taken for issues identified during pipe to soil inspections performed in 2014 indicate corrective actions were taken when issues with test leads were identified.		
[192.491][192.473(b)]	Has the operator maintained documentation of inspections or tests to assure their cathodic protection system is not affecting adjacent underground metallic structures?	Satisfactory
<u>General Comment:</u> Ameren procedures require prior to installing a new rectifier or making changes to existing rectifier settings, a review is to be conducted to ensure the rectifier was not affecting neighboring facilities. No new rectifiers were installed in the Belleville Service Area in 2014.		
[192.491][192.475(a)]	Has the operator maintained documentation	Not Applicable

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	of investigations or steps taken to minimize internal corrosion due to transportation of corrosive gas?	
General Comment: <i>The piping located in the Belleville system does not transport corrosive gas. They receive pipeline quality gas from their suppliers.</i>		
[192.491][192.475(b)]	Has the operator maintained documentation of internal surface inspections performed when pipe is removed for any reason?	Satisfactory
General Comment: <i>Review of pipe exam reports completed in 2014 for the Belleville Service Area indicate internal inspections were conducted when piping was removed or access was available to inspect the internal piping condition. No indications of internal corrosion have been identified in the Belleville system.</i>		
[192.491][192.477]	Has the operator maintained documentation of internal corrosion coupon monitoring at a minimum of 2 per year/ 7 1/2 months?	Not Applicable
General Comment: <i>No corrosion coupon monitoring is performed in the Belleville Service Area due to no issues with internal corrosion being identified.</i>		
[192.491][192.481]	Has the operator maintained documentation of atmospheric corrosion control monitoring at a minimum of 1 per 3 years/ 39 months?	Satisfactory
General Comment: <i>Ameren performs atmospheric corrosion inspections on above ground piping during distribution leakage surveys conducted on a 4 year interval per their Waiver allowing 4 years to be performed during the distribution leak survey. Above ground piping located at pressure regulating stations are inspected during the annual inspections and were performed as required in 2014. Critical patrols of above ground or exposed piping were completed as required in 2014 and included inspections for atmospheric corrosion.</i>		
[192.491][192.479]	Has the operator maintained documentation of corrective action where atmospheric corrosion was discovered?	Satisfactory
General Comment: <i>Review of documentation of corrective actions taken due to corrosion resulting from paint failures or disbonded coating on above ground piping, indicate corrective actions were taken on instances identified during the atmospheric corrosion inspections performed during the leak surveys completed in 2014 for the Belleville Service Areas.</i>		
[192.491][192.483(a), 192.483(b), 192.483(c)]	Has the operator maintained documentation demonstrating that pipe removed due to external corrosion has been repaired or replaced with pipe that was coated and cathodically protected?	Satisfactory
General Comment: <i>Review of leak repair documentation and atmospheric corrosion inspections indicate corrective actions were taken when external corrosion or coating issues were identified in 2014.</i>		
TRAINING - 83 IL ADM. CODE 520		Status
[520.10(a) (1)]	Has the operator maintained documentation	Not Checked

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	demonstrating that personnel have received adequate training?	
<p><u>General Comment:</u></p> <p><i>Training records are retained at the Ameren Training Center located in Pawnee, Illinois and were not reviewed as part of this audit. A separate audit is performed at that location to review the training provided to their personnel. Ameren has an apprentice program for their gas personnel and an individual in that program has multiple sessions of training and testing that are required to be completed prior to reaching the Gas Journeyman status.</i></p>		
[520.10(a) (2)]	Do training records include verbal instruction and/or on the job training for each job classification?	Not Checked
<p><u>General Comment:</u></p> <p><i>Training records are retained at the Ameren Training Center located in Pawnee, Illinois and were not reviewed as part of this audit. A separate audit is performed at that location to review the training provided to their personnel. Ameren has an apprentice program for the gas department and an individual in that program has multiple sessions of training and testing that are required to be completed prior to reaching the Gas Journeyman status. During the Apprentice Program personnel are required to work under qualified personnel to get the necessary experience working in the field and are required to log hours performing certain tasks to get the required number of field hours toward their apprenticeship.</i></p>		
[520.10(b)]	Has the municipal operator maintained documentation demonstrating that personnel have received adequate training?	Not Applicable
<p><u>General Comment:</u></p> <p><i>Ameren is not a municipal system so this requirement is not applicable.</i></p>		
[520.10(a)(5)]	Are procedures periodically updated to include new materials, new methods of operation and installation, and changes in general procedures?	Satisfactory
<p><u>General Comment:</u></p> <p><i>Ameren performs at a minimum annual training for their operations, maintenance and service personnel regarding changes to their Operations and Maintenance Manual and associated plans. If new procedures are established, these are sent out to the local operating areas and training is provided when required.</i></p>		

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